

CALFRESH REQUEST FOR POLICY INTERPRETATION**PI# 18-31**

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Retain a copy for your records and submit via email to CalFresh-PI@dss.ca.gov.

Please note: the policy interpretation provided is based on the unique set of facts presented and should not be assumed to apply in all scenarios.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Other:		5. DATE OF REQUEST: 03/16/2018	NEED RESPONSE BY: 03/23/2018
2. REQUESTOR NAME:		6. COUNTY/ORGANIZATION: Kern - DHS	
3. PHONE NO.:	EMAIL:	7. SUBJECT: Student Eligibility Status, Reporting and Verification	
4. REGULATION CITE(S): MPP 63-300; 63-406.3. 63-406.22, 63-401, 63-402.227		8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). ACL 17-05, ACIN I-45-11, ACIN I-45-11E, ACL 12-25, ACIN I-89-15	
9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):			

The following questions require clarification to process student eligibility.

1. If client self certifies (verbal report) himself or herself as a full time student is documentary evidence required? Or is a journal justifying the verbal report sufficient?
2. If client reports a student exemption or meets an eligible student requirement is documentary evidence required to prove the exemption or eligible student requirement?
3. Client reports at SAR 7 an ineligible student now has earnings but verification of earnings are not provided, is the SAR 7 complete, since they are an excluded CalFresh member?
4. Client reports at SAR 7 receipt of Financial Aid, no previous report of enrolled in institution of higher education, would the SAR 7 be returned back as incomplete to obtain more information on student status?

10. REQUESTOR'S PROPOSED ANSWER:
1. The client's self-certification or verbal report of enrollment as a full time student in an institution of higher education should be accepted without further verification, unless the client is unsure of the full time definition and needs assistance in determining full time student status. A journal in the case must provide sufficient information to justify the client's report. 2. CWDs must verify whether a student meets an exemption before allowing the student exemption and determining eligibility. If documentary evidence is not available, then self-certification is acceptable. Some exemptions the CWD should have verified in the case without any further verification required from the client. All means of acceptable verification should be explored with the client. 3. ACIN I-89-15 states any household member who is identified as ineligible for CalFresh must have their circumstances evaluated to determine if they meet any of the student exemptions. Since CWD is attempting to verify the HH member is potential eligible for CF, the CWD would issue a CW 2200 and request income verification. (cont. p2)

11. STATE POLICY RESPONSE (CFPB USE ONLY):
1. If a client self-certifies that he/she is a full time student, written documentation from the CWD in the case file justifying the verbal report from the client is sufficient. 2. Per ACIN I-89-15, it is the responsibility of the CWDs to determine if a student satisfies any of the exemptions cited in Section 63-406.2. 3. Based on the information provided, since the student was initially ineligible and considered an excluded member, the SAR 7 would be processed as complete. The reported income of the excluded member would then need to be verified by the CWD. 4. Based on the scenario provided, financial aid is excluded income per 63-502.2 (e)(1). Therefore, no documentation is needed. Additionally student status is not a mandatory mid period or SAR 7 report, only at application and recertification per ACIN I-89-15. Therefore, CWDs should note a change in student status in the case file (CONTINUED ON PG 2)

FOR CDSS USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY/ALJ:
	4.24.18 JR

CALFRESH REQUEST FOR POLICY INTERPRETATION (Continued)**PI#18-31**

1. RESPONSE NEEDED DUE TO: <input type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Other:		5. DATE OF REQUEST:	NEED RESPONSE BY:
2. REQUESTOR NAME:		6. COUNTY/ORGANIZATION:	
3. PHONE NO.: EMAIL:		7. SUBJECT:	
4. REGULATION CITE(S):		8. REFERENCES: <i>(Include ACL/ACIN, court cases, etc. in references)</i> NOTE: All requests must have a regulation cite(s) and/or a reference(s).	

3. (cont. pg1) The SAR 7 would be processed as complete without making the SAR 7 incomplete for the excluded household's income. If the CW 2200 were not returned, the change would be held over until the Recertification. If the CW 2200 were returned with income verification, the CWD would take action to determine student eligibility, allowing 10-days to decrease benefits mid-period.

4. ACIN I-89-15 states that student status must be reported at Application and Recertification and is not required mid-period. If the household reports on the SAR 7 a change in student status that would cause an adverse action the CWD will hold the change over until the Recertification and the SAR 7 should be processed as complete.

STATE RESPONSE CONTINUED:

and follow up at recertification. The SAR 7 should be processed as complete.